

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

MARCUS L. BLAND,

Defendant

UNDER SEAL

Case No. 1:20-mj-106



AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT

I, Ashleigh C. Hall, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") since 2014. I am currently assigned to the ATF Falls Church Group II Field Office. In my capacity as a law enforcement officer, I have investigated individuals for the illegal possession and use of firearms, illegal possession and distribution of controlled substances, and for committing violent crimes. Many of these investigations involved the execution of search warrants, and led to the arrest and conviction of individuals for violations of state and federal firearms and drug trafficking laws.

2. This affidavit is submitted in support of a criminal complaint and arrest warrant charging Marcus L. BLAND (BLAND) and Timothy WILLIAMS (WILLIAMS) with conspiracy to distribute and to possess with the intent to distribute, 280 grams of cocaine base (crack), a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 846.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, law enforcement and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

A. Background on the Investigation

4. In November 2018, ATF and the Prince William County Police Department (PWCPD) began investigating Cooperating Defendant (CD-1), an individual engaged in the distribution of firearms and narcotics within Prince William County, Virginia. Based on that investigation, CD-1 agreed to cooperate with law enforcement. CD-1 is cooperating in the hopes of receiving a reduced sentence after pleading guilty to controlled substance and firearms offenses in the Eastern District of Virginia. The information provided by CD-1 has been reliable and accurate. CD-1's cooperation and information have led to the recovery of controlled substances. For these reasons, I consider CD-1 reliable. CD-1 will be referenced as masculine regardless of actual gender.

5. In February 2019, CD-1 informed law enforcement that his acquaintance, Timothy WILLIAMS, who had been CD-1's drug customer, knew someone capable of providing crack. WILLIAMS explained that his source, later identified as BLAND, could sell CD-1 ounce-quantities of crack for approximately \$1,150 per ounce. WILLIAMS also claimed that he could facilitate transactions between CD-1 and BLAND. WILLIAMS stated that BLAND lived at or near the Chesapeake Apartments located in Dumfries, Virginia.

B. Controlled Purchase of Cocaine Base from BLAND on March 18, 2019

6. On or about March 18, 2019, law enforcement utilized CD-1 to conduct a controlled purchase of approximately one ounce of crack for \$1,150 from BLAND through WILLIAMS. Before the transaction, law enforcement searched CD-1 and his vehicle for contraband. Finding none, law enforcement provided CD-1 with ATF cashier funds and several devices to record and transmit audio and location information. At law enforcement's direction, CD-1 called WILLIAMS to confirm the deal. Law enforcement conducted surveillance throughout the transaction. CD-1 picked up WILLIAMS at or near an apartment complex in Woodbridge, Virginia, and proceeded to Chesapeake Apartments. CD-1 parked in front of building 3113 Chesapeake Dr., Dumfries, Virginia (hereinafter referred to as the DEAL LOCATION). CD-1 provided WILLIAMS with \$1,150 to conduct the transaction with BLAND. Law enforcement observed BLAND walk towards WILLIAMS and CD-1. Law enforcement then observed WILLIAMS exit CD-1's vehicle and meet with BLAND beside dumpsters that were next to building 3113. Following a brief hand-to-hand exchange, WILLIAMS returned to CD-1's vehicle with the crack at which point he and CD-1 departed the DEAL LOCATION. CD-1 brought WILLIAMS back to the area where they originally met and they parted ways. Law enforcement continued to follow CD-1 as he left the area and proceeded to a previously agreed upon meet location.

7. CD-1 provided law enforcement with the suspected crack he purchased during the transaction. Law enforcement searched CD-1 for additional contraband with negative results. Laboratory testing confirmed the substance contained cocaine base and had a net weight of 24.36 grams.

C. Controlled Purchase of Cocaine Base from BLAND on April 3, 2019

8. On or about April 3, 2019, law enforcement utilized CD-1 to conduct a controlled purchase of approximately two ounces of crack for \$2,300 from BLAND through WILLIAMS. Law enforcement searched CD-1 and his vehicle for contraband. Finding none, law enforcement provided CD-1 with ATF cashier funds and several devices to record and transmit audio and location information. CD-1 placed a call to WILLIAMS in the presence of law enforcement. WILLIAMS confirmed the pending transaction and directed CD-1 to pick him up at a location at or near Woodbridge, Virginia.

9. Law enforcement conducted surveillance throughout the transaction. CD-1 traveled to a plaza in Woodbridge, Virginia, picked up WILLIAMS, and proceeded to Chesapeake Apartments. During the trip, WILLIAMS placed a telephone call to BLAND. During this call, WILLIAMS advised BLAND that CD-1 wanted to purchase two ounces of crack instead of one. BLAND confirmed he could provide the requested amount and that he would meet WILLIAMS at the DEAL LOCATION. CD-1 and WILLIAMS arrived at Chesapeake Apartments and parked near the DEAL LOCATION. A short time later, law enforcement observed BLAND exit building 3102 Chesapeake Dr., Dumfries, Virginia, and head toward the DEAL LOCATION.

10. CD-1 provided WILLIAMS with the \$2,300 to conduct the transaction with BLAND. WILLIAMS exited CD-1's vehicle and met with BLAND on the side of building 3113. Law enforcement watched as WILLIAMS and BLAND conducted a brief hand-to-hand exchange. WILLIAMS then returned to CD-1's vehicle and provided CD-1 with the suspected crack. WILLIAMS then departed the DEAL LOCATION on foot. At the conclusion of the transaction, law enforcement observed BLAND return inside building 3102 Chesapeake Dr., Dumfries, Virginia.

11. CD-1 departed the DEAL LOCATION and met with law enforcement at a previously established location. CD-1 provided the suspected crack to law enforcement. Laboratory testing confirmed the substance contained cocaine base and had a net weight of 48.87 grams.

D. Controlled Purchase of Cocaine Base from BLAND on April 29, 2019

12. On or about April 29, 2019, law enforcement utilized CD-1 to conduct a controlled purchase of approximately two ounces of crack for \$2,300 from BLAND through WILLIAMS. Law enforcement searched CD-1 and his vehicle for contraband. Finding none, law enforcement provided CD-1 with \$2,300 in ATF cashier funds and several devices to record and transmit audio and location information. CD-1 placed a call to WILLIAMS in the presence of law enforcement. WILLIAMS confirmed the pending transaction and directed CD-1 to pick him up at or near Woodbridge, Virginia.

13. Law enforcement conducted surveillance throughout the transaction. CD-1 picked up WILLIAMS and proceeded to the Chesapeake Apartments. CD-1 and WILLIAMS arrived at Chesapeake Apartments and parked at the DEAL LOCATION. Shortly thereafter, law enforcement observed BLAND exit building 3102 Chesapeake Dr. and walk in the direction of the DEAL LOCATION. CD-1 provided WILLIAMS with \$2,300 to conduct the transaction. WILLIAMS exited CD-1's vehicle and proceeded to the side of building 3113 where he waited for BLAND. WILLIAMS and BLAND met up and walked back towards CD-1's vehicle. WILLIAMS got back in the vehicle while BLAND continued walking towards building 3102 Chesapeake Dr., Dumfries, Virginia. WILLIAMS provided CD-1 with the crack and then departed the DEAL LOCATION on foot. Law enforcement observed BLAND return inside building 3102 Chesapeake Dr., Dumfries, Virginia.

14. CD-1 departed the DEAL LOCATION and met with law enforcement at a previously established location where CD-1 provided law enforcement with the suspected crack. Laboratory testing confirmed the substance contained cocaine base and had a net weight of 49.15 grams.

E. Controlled Purchase of Cocaine Base from BLAND on May 7, 2019

15. On or about May 7, 2019, law enforcement utilized CD-1 to conduct a controlled purchase of three ounces of crack from BLAND for \$3,450. Law enforcement searched CD-1 and his vehicle for contraband. Finding none, law enforcement provided CD-1 with \$3,450 in ATF cashier funds as well as several devices, which collectively record and transmit audio and location information. CD-1 told law enforcement that WILLIAMS had already called to confirm the transaction and directed CD-1 to pick him up at or near Woodbridge, Virginia. Law enforcement conducted surveillance throughout the transaction. CD-1 picked up WILLIAMS, and continued to the Chesapeake Apartments. During the drive, WILLIAMS called BLAND and advised that CD-1 wanted to purchase three ounces of crack and asked BLAND how much that amount would cost. BLAND responded that it was the same price for each one; meaning \$1,150 per ounce. CD-1 and WILLIAMS arrived at Chesapeake Apartments and parked at the DEAL LOCATION.

16. Law enforcement observed BLAND exit building 3102 Chesapeake Dr., Dumfries, Virginia, and walk towards the DEAL LOCATION. CD-1 provided WILLIAMS with \$3,450 to conduct the transaction. WILLIAMS met with BLAND on the side of building 3113. WILLIAMS then returned to CD-1's vehicle. Law enforcement observed BLAND walk back toward building 3102. WILLIAMS provided CD-1 with the crack and then departed the DEAL

LOCATION on foot. Law enforcement observed BLAND return inside building 3102 Chesapeake Dr., Dumfries, Virginia, and proceed up the first set of stairs.

17. CD-1 departed the DEAL LOCATION and met with law enforcement at a previously established location where CD-1 provided the crack. Law enforcement discovered the suspected amount of crack was approximately one-half ounce less than the agreed upon amount, totaling only two and one-half ounces instead of three. Laboratory testing confirmed the substance contained cocaine base and had a net weight of 66.47 grams. The transaction was audio recorded.

F. Controlled Purchase of Cocaine Base from BLAND on June 25, 2019

18. On or about June 25, 2019, law enforcement utilized CD-1 to arrange a controlled purchase of one ounce of crack from BLAND for \$1,150. Before the controlled purchase, both CD-1 and his vehicle were searched for contraband with negative results. CD-1 was provided with ATF cashier funds and several devices that collectively record and transmit audio and location information. CD-1 was also provided with a digital scale so he could weigh the crack in BLAND's presence. CD-1 advised law enforcement that he planned to pick up WILLIAMS at a location at or near Woodbridge, Virginia. CD-1 also told law enforcement that WILLIAMS confirmed that BLAND would have one ounce of crack available to sell. Law enforcement followed CD-1 conducting surveillance and observed CD-1 retrieve WILLIAMS at or near Woodbridge, Virginia, and continue toward the Chesapeake Apartments. CD-1 and WILLIAMS arrived at the Chesapeake Apartments and parked at the DEAL LOCATION.

19. Law enforcement observed BLAND exit building 3102. Law enforcement then observed a white pick-up truck cross over Chesapeake Dr., from building 3102 and head toward the DEAL LOCATION. Law enforcement then saw BLAND in the passenger seat of a white

pick-up truck, which parked next to CD-1's vehicle. BLAND then exited the white pick-up and entered the back seat of CD-1's vehicle. BLAND provided CD-1 with the suspected crack. CD-1 placed it on the digital scale and confirmed that it weighed approximately 30 grams. CD-1 then paid BLAND \$1,150. BLAND exited CD-1's vehicle and returned inside building 3102 Chesapeake Dr., Dumfries, Virginia. CD-1 and WILLIAMS departed the DEAL LOCATION. CD-1 returned WILLIAMS to the approximate location where they originally met and they parted ways. CD-1 then continued to a previously agreed upon location to rendezvous with law enforcement.

20. CD-1 provided the suspected crack to law enforcement. CD-1 and his vehicle were searched again for illegal or unauthorized items with negative results. A field test of the suspected crack confirmed the presence of cocaine. Laboratory testing confirmed the substance contained cocaine base and had a net weight of 27.26 grams. The transaction was audio recorded.

G. Controlled Purchase of Cocaine Base from BLAND on June 27, 2019

21. On or about June 27, 2019, law enforcement utilized CD-1 to arrange a controlled purchase of one ounce of cocaine base for \$1,150 from BLAND through WILLIAMS. Before the controlled purchase, law enforcement searched both CD-1 and his vehicle for any illegal or unauthorized items with negative results. CD-1 was provided with ATF cashier funds and several devices that collectively record and transmit audio and location information. CD-1 called WILLIAMS to arrange the deal. WILLIAMS told CD-1 to pick him up at a location at or near Woodbridge, Virginia. Law enforcement observed CD-1 retrieve WILLIAMS and continue toward the Chesapeake Apartments. CD-1 and WILLIAMS arrived at Chesapeake Apartments and parked at the DEAL LOCATION.

22. Law enforcement observed BLAND exit building 3102 and walk toward the DEAL LOCATION. CD-1 provided WILLIAMS with \$1,150 to conduct the transaction. WILLIAMS exited CD-1's vehicle and met with BLAND on the side of building 3113. Following a brief hand-to-hand transaction WILLIAMS and BLAND separated. WILLIAMS went back to CD-1's vehicle while BLAND returned inside 3102 Chesapeake Dr. WILLIAMS provided CD-1 with the suspected crack and then exited CD-1's vehicle and departed the area on foot.

23. CD-1 departed the DEAL LOCATION and proceeded to a previously agreed upon location to rendezvous with law enforcement. CD-1 provided the suspected crack to law enforcement. CD-1 and his vehicle were searched for illegal or unauthorized items with negative results. A field test of the suspected crack confirmed the presence of cocaine. Laboratory testing confirmed the substance contained cocaine base and had a net weight of 27.24 grams. The transaction was audio recorded.

H. Controlled Purchase of Cocaine Base from BLAND on July 1, 2019

24. On or about July 1, 2019, law enforcement utilized CD-1 to arrange a controlled purchase of two ounces of cocaine base for \$2,300 from BLAND through WILLIAMS. Before the controlled purchase, law enforcement searched both CD-1 and his vehicle for any illegal or unauthorized items with negative results. CD-1 was provided with ATF cashier funds and several devices that collectively record and transmit audio and location information. CD-1 informed law enforcement that WILLIAMS had called CD-1 to confirm the transaction. WILLIAMS also asked CD-1 to pick him up at a location in or near Dumfries, Virginia. Law enforcement observed CD-1 retrieve WILLIAMS and continue to the Chesapeake Apartments. CD-1 and WILLIAMS arrived at Chesapeake Apartments and parked at the DEAL LOCATION.

25. WILLIAMS exited CD-1's vehicle. BLAND then approached CD-1's vehicle and attempted to get in the backseat, finding the door locked. CD-1 advised BLAND the front passenger door was unlocked. BLAND inquired about WILLIAMS's attendance, to which CD-1 answered that WILLIAMS was over by the side of building 3113. BLAND proceeded over to WILLIAMS. WILLIAMS then returned to CD-1's vehicle and provided CD-1 with the suspected crack. CD-1 in return, provided WILLIAMS with \$2,300. Law enforcement observed WILLIAMS walk to BLAND's location. WILLIAMS and BLAND departed the DEAL LOCATION on foot. Law enforcement observed as BLAND entered building 3102. Based on my training and experience, my knowledge of this investigation, and my discussions with CD-1, I believe WILLIAMS provided BLAND with the money to pay for the suspected crack cocaine at the conclusion of the transaction.

26. CD-1 departed the DEAL LOCATION and proceeded to a previously agreed upon location to rendezvous with law enforcement. CD-1 provided the suspected crack to law enforcement. Law enforcement searched CD-1 and his vehicle for illegal or unauthorized items with negative results. A field test of the suspected crack confirmed the presence of cocaine. Laboratory testing confirmed the substance contained cocaine base and had a net weight of 54.17 grams. The transaction was audio recorded.

I. Controlled Purchase of Cocaine Base from BLAND on September 19, 2019

27. On or about September 19, 2019, law enforcement utilized CD-1 to arrange a controlled purchase of one-half ounce of cocaine base for \$550 from BLAND through WILLIAMS. Before the controlled purchase, law enforcement searched CD-1 and his vehicle for any illegal or unauthorized items, with negative results. Law enforcement provided CD-1 with ATF cashier funds and several devices that collectively record and transmit audio and

location information. WILLIAMS asked CD-1 to pick him up at a location in or near Woodbridge, Virginia. Law enforcement observed CD-1 retrieve WILLIAMS and continue to the Chesapeake Apartments. CD-1 and WILLIAMS arrived at Chesapeake Apartments and parked at the DEAL LOCATION.

28. While CD-1 and WILLIAMS were *en route* to the deal location, WILLIAMS called BLAND and told him that he (WILLIAMS) was five minutes away. Soon after this call, law enforcement observed BLAND exit 3102 Chesapeake Dr., apartment 201, Dumfries, Virginia, and proceed across Chesapeake Dr. to a nearby gas station. CD-1 and WILLIAMS arrived at the DEAL LOCATION, CD-1 provided WILLIAMS with the money to conduct the transaction. WILLIAMS exited CD-1's vehicle and proceeded to the same gas station. Shortly thereafter, law enforcement observed WILLIAMS exit the gas station and return to CD-1's vehicle. CD-1 and WILLIAMS departed the area. Minutes later, law enforcement observed BLAND exit the gas station and return to 3102 Chesapeake Dr., apartment 201, Dumfries, Virginia.

29. After departing the DEAL LOCATION, CD-1 returned WILLIAMS to a location at or near Woodbridge, Virginia. CD-1 then proceeded to a previously agreed upon location to rendezvous with law enforcement. CD-1 gave law enforcement the suspected crack. Law enforcement searched CD-1 and his vehicle for illegal or unauthorized items with negative results. A field test of the suspected crack confirmed the presence of cocaine. Law enforcement submitted the substance to the DEA laboratory for further analysis, the results of which are pending.

J. Federal Search Warrant at 3102 Chesapeake Dr. (BLAND Residence) on October 10, 2019

30. On October 2, 2019, the Honorable John F. Anderson, United States Magistrate Judge for the Eastern District of Virginia, issued a search warrant for 3102 Chesapeake Dr. Apartment 201, Dumfries, Virginia, 22026: BLAND's residence. On October 10, 2019, law enforcement executed this warrant. BLAND was present during the search warrant. Virginia state law enforcement officials arrested BLAND based on an outstanding felony warrant. During the search of the residence, law enforcement recovered approximately \$12,546, approximately 157 grams of suspected crack, indicia of ownership, several cellular telephones and other drug trafficking paraphernalia.

31. During the execution of the warrant, BLAND informed of his rights against self-incrimination. BLAND agreed to speak with law enforcement. BLAND stated there was a small amount of marijuana and crack in the master bedroom. Furthermore, during a review of the currency recovered during the search warrant, law enforcement identified two \$50 bill serial numbers that matched ATF "buy money" utilized during the June 27, 2019, controlled purchase.

32. A field test of the suspected crack confirmed the presence of cocaine. Law enforcement submitted the substance to the DEA laboratory for further analysis, the results of which are pending.

CONCLUSION

33. Based upon the foregoing, I submit there is probable cause to support that on or about March 18, 2019 until October 10, 2019, in Prince William County, Virginia, within the Eastern District of Virginia and elsewhere, Marcus L. BLAND and Timothy WILLIAMS, did knowingly and intentionally conspire to distribute, and possess with the intent to distribute, 280 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 846. I therefore

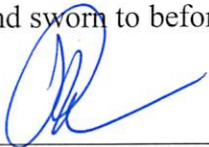
request that this Court issue criminal complaints alleging this violation along with warrants for
MARCUS L. BLAND's and TIMOTHY WILLIAM's arrest.

Respectfully submitted,



Ashleigh C. Hall
Special Agent
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Subscribed and sworn to before me on March 12, 2020.



Theresa Carroll Buchanan
United States Magistrate Judge

The Honorable Theresa C. Buchanan
United States Magistrate Judge